

Holland & Knight

787 Seventh Avenue, 31st Floor | New York, NY 10019 | T 212.513.3200 | F 212.385.9010
Holland & Knight LLP | www.hklaw.com

Warren E. Gluck
+1 212-513-3396
Warren.Gluck@hklaw.com

May 10, 2024


Via ECF

Hon. Jennifer L. Rochon
United States District Court
Southern District of New York
500 Pearl Street, Room 1920
New York, New York 10007

The request is GRANTED. All appearing Defendants shall respond to the Second Amended Complaint by May 22, 2024. Plaintiff shall oppose any motions to dismiss from such Defendants by July 12, 2024. Defendants shall submit their reply by August 2, 2024.

Dated: May 13, 2024
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

Re: *Orient Plus Int'l Ltd., et al. v. Baosheng Media Grp. Holdings Ltd., et al.*, 1:24-cv-00744-JLR

Dear Judge Rochon:

We were recently retained as substitute counsel for Defendant Baosheng Media Group Holdings Limited (“Baosheng”) in the above-referenced matter.¹ Pursuant to Rule 1.F of Your Honor’s Individual Rules of Practice in Civil Cases, we write on behalf of all Defendants, and with the agreement of all parties including Plaintiffs, to request an extension of time to respond to Plaintiffs’ Second Amended Complaint from May 13, 2024 to May 22, 2024 and to set an agreed-upon briefing schedule for any motions to dismiss Plaintiffs’ Second Amended Complaint. Defendants make this request to allow this Firm additional time to digest the client’s file and to allow a streamlined response to Plaintiffs’ Second Amended Complaint.

Baosheng previously requested an extension of time to respond to Plaintiffs’ Amended Complaint from March 22, 2024 to April 5, 2024, which was granted by this Court. See ECF No. 45. Then, Baosheng, together with Defendants Marcum LLP, Friedman LLP, Univest Securities LLC, Westpark Capital, Inc., and Benchmark Company, LLC, requested an extension of time to respond to Plaintiffs’ Amended Complaint to May 13, 2024, which was also granted by this Court. See ECF No. 66.

¹ On May 10, 2024, Holland & Knight filed a Stipulation and Proposed Order Granting Substitution of Counsel executed by Baosheng and Mr. Hunter at Hunter Taubman Fischer & Li LLC (the “Stipulation”). See ECF No. 85. By Order of the same date, the Court notified counsel that the Stipulation failed to comply with Local Rule 1.4. See ECF No. 86. Because the clients are in Asia, Holland & Knight is unable to file a corrected stipulation today. However, in light of the imminent deadline to respond to Plaintiffs’ Second Amended Complaint, Holland & Knight files this letter. Holland & Knight plans to file an updated stipulation that complies with Local Rule 1.4 as soon as practicable.

The parties have agreed to the following schedule for any motions to dismiss Plaintiffs' Second Amended Complaint:

- Deadline for Defendants' answer or respond: **May 22, 2024**
- Deadline for Plaintiffs' opposition: **July 12, 2024**
- Deadline for Defendants' reply: **August 2, 2024**

All parties respectfully request that the Court extend the time to answer or otherwise respond to Plaintiffs' Second Amended Complaint to May 22, 2024 for all appearing Defendants and to adopt the agreed-upon briefing schedule set forth above.

Thank you for your consideration.

Respectfully Submitted,

/s/ Warren E. Gluck

Warren E. Gluck, Esq.

cc: All counsel of record (*via ECF*)